

# **EXHIBIT DD**

21-108

# Pharmacy Manual

## Security



### Purpose

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To provide guidelines to Pharmacy Distribution Center (DC) associates related to maintaining secure prescription product storage and processing areas.

### Resources

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Link	Resources
<b>Procedures</b>	
DC 07-0105	Asset Protection (AP) Office Duties
DC 07-0111	CCTV System Guidelines
<b>Items Needed</b>	
	Criminal Background Checks Compliance and Training Guidelines
	Managers Contact List

### Procedures

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#### Associates

All associates gain access to the facility by utilizing biometric scanners located at all entry points.

#### Visitors

No visitors are allowed in the Pharmacy DC unless escorted by a Walmart Associate. Associates visiting the DC off the clock can only access the office area, break room, or conference room. All visitors must sign in according to DC 07-105 AP Office Duties.

#### Closed Caption Television (CCTV)

In accordance with DC 07-0111 CCTV System Guidelines, Pharmacy DCs are monitored inside and outside by CCTV. AP and DC Management determine camera locations. Cameras cannot be used in areas generally considered private, such as restrooms.

At a minimum, cameras must monitor the following areas:

- Parking Lot
- Parking Lot Entrance
- Associate Entrance
- Drivers Entrance
- Lobby
- Human Resources (HR) Area
- AP Office Window
- Money Handling Areas
- Controlled Pharmaceutical Cage Stocking Area
- Controlled Pharmaceutical Cage Picking Area
- Controlled Pharmaceutical Cage Verifying Stations
- Controlled Pharmaceutical Cage Cutting Stations
- Receiving Area
- Shipping Area

- Systems/Data Processing Area
- Hazardous Waste Area
- Quarantine Areas

AP conducts weekly reviews of CCTV video footage and logs all reviews. Only AP can conduct video reviews. Anyone requesting review of a specific video must go through DC Management. A manager requests specific video reviews. The video library must be maintained for a minimum of 30 days.

Hindering, tampering with, or otherwise compromising any CCTV equipment may result in disciplinary action, up to and including termination.

### Security Alarm System

All DCs are equipped with an alarm system that includes:

- Contact breakers
- Motion sensors
- Panic alarms

Alarm Central 479-272-4600 monitors these alarms. During normal business hours, Alarm Central calls the Pharmacy DC if it receives an alarm. During off-hours, Alarm Central handles notification based on the Managers Contact List on file. Managers must keep the Managers Contact List updated.

All controlled substance cages are equipped with an alarm system, which Alarm Central monitors. Make sure all controlled substance cages are armed when not in use, even during normal business hours.

All managers and AP Associates must make sure the Pharmacy DC is armed and secured at the end of the business day. Any violation of these security procedures may result in disciplinary action up to and including termination.

### Control Cage Access

Only authorized associates are allowed to enter the Control Cage unaccompanied. A list of all authorized individuals must be posted outside the Control Cage. The listed associates are the only associates given authority in the bio-metric entry system that AP maintains.

#### Important!

Those **not authorized** to enter the Control Cage unaccompanied can only **enter with an authorized** associate and **must sign** the Cage Visitor **Log** in the Control Cage. Maintain these logs for 18 months.

### Off-Hours Access

Access to the Pharmacy DCs during off-hours is limited to either of the following:

- Two members of management
- One member of AP

**Exception:** Managers or AP associates responding to an alarm during off-hours. In most cases, local law enforcement will be on site.

**Exception:** If a Pharmacy DC has an office area separate from the drug storage and processing area, managers can access the office area without another manager or AP Associate present.

### **Background Checks**

Perform a criminal background check on all new and transfer Pharmacy DC associates according to the Criminal Background Checks Compliance and Training Guidelines. Background checks must be national in nature and based on current and previous residences. Base the check on the maximum amount of time allowed by the state.